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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jorge Luis Ramirez Lopez,

Plaintiff

V.

Clyde A. Moore, et al.

Defendants

Case No. 2:24-cv-01595-CDS-BNW

Order Approving Stipulation to Extend Federal Defendants' Deadline to File Reply in Support of its Cross-motion for Summary Judgment (First Request)

[ECF No. 28]

Plaintiff, Jorge Luis Ramirez Lopez, through counsel and the United States of America on behalf of Federal Defendants (“Federal Defendants”), through undersigned counsel, hereby stipulate and agree as follows:

1. On January 28, 2025, the Court entered an order approving the stipulated briefing schedule establishing the following deadlines: Plaintiff's motion for summary judgment was to be filed by March 7, 2025; Federal Defendants' opposition and combined cross-motion for summary judgment was due by April 4, 2025; Plaintiff's reply in support of his motion and his opposition to Federal Defendants' cross-motion for summary judgment was to be filed by April 25, 2025; and Federal Defendants' reply in support of its cross-motion for summary judgment was to be filed on May 9, 2025. (ECF No. 13).

2. Subsequent to that order, the Court granted Federal Defendants three

1 extensions to file their opposition and cross-motion, ultimately extending their deadline
2 from April 4, 2025, to April 17, 2025. (ECF No. 21).

3 3. Federal Defendants filed their opposition to Plaintiff's motion for summary
4 judgment and cross-motion for summary judgment on April 17, 2025. (ECF No. 22, 24).

5 4. The parties subsequently entered into a stipulation and order granted by this
6 Court extending the time for Plaintiff to file their reply in support of their motion for
7 summary judgment and their response to Federal Defendants' cross-motion for summary
8 judgment through May 9, 2025. (ECF No. 26).

9 5. Plaintiff filed his reply in support of his motion for summary judgment and
10 to Federal Defendants' cross-motion for summary judgment on May 9, 2025. (ECF No.
11 27).

12 6. Per the stipulated briefing schedule, Federal Defendants' reply in support of
13 its Cross-Motion for Summary Judgment was initially due on May 9, 2025 (ECF No. 13).

14 7. Because the dates were extended in the initial stipulated briefing schedule
15 such that Plaintiff filed his reply in support of his motion for summary judgment and to
16 Federal Defendants' cross-motion for summary judgment on May 9, 2025, the parties
17 request that the Court extend the deadline for Federal Defendants to file their reply in
18 support of its counter-motion for summary judgment from May 9, 2025 through May 30,
19 2025.

20 8. Good cause exists for this extension, as it will allow Federal Defendants'
21 counsel time to review Plaintiff's filing to prepare a thorough and complete reply.

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1 Accordingly, the parties respectfully request that the Court extend the deadline for
2 Federal Defendants to file its reply in support of its cross-motion for summary judgment
3 through May 30, 2025. This stipulation is requested in good faith and not for the purpose of
4 undue delay.

5 Respectfully submitted this 14th day of May of 2025.

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7
8 /s/ Maria E. Quiroga
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12 *Attorney for Plaintiff*

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14 /s/ Karissa D. Neff
15 KARISSA D. NEFF
16 Assistant United States Attorney
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18 *Attorneys for the United States*

19 Based on the parties' stipulation, the deadline for the federal
20 defendants to file their reply in support of their cross-motion for summary
21 judgment is extended to May 30, 2025.

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Cristina D. Silva
United States District Judge

Dated: May 16, 2025